

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0053554

00-ERD-182

SEP 22 2000

Ms. Jane A. Hedges
Clean-up Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

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Addressees:

REQUEST FOR APPROVAL OF THE DISPOSAL OF 200-CW-1 OPERABLE UNIT (OU)
CHARACTERIZATION WASTE AT THE ENVIRONMENTAL RESTORATION DISPOSAL
FACILITY (ERDF)

This request is submitted in accordance with the provisions in Section 9.0 "Special Circumstances" of the Strategy for Management of Investigation Derived Waste (IDW), which states:

"The RCRA and CERCLA Project Managers designated by the respective Tri-Party participants (DOE-RL, Ecology and EPA) shall have authority to negotiate IDW criteria not specified in this strategy. Additionally, the Project Managers may, on a case-by-case basis, negotiate exceptions to requirements identified in this strategy. Any such exceptions shall require the approval, in writing, from the Project Manager of the Lead Regulatory Agency."

This request covers IDW placed in eight drums generated during the field investigation activities at the Gable Mountain Pond for the 200-CW-1 OU. This waste was sampled and designated in accordance with the Sampling and Analysis Plan (SAP) included in the 200-CW-1 Work Plan. This SAP was reviewed by State of Washington Department of Ecology (Ecology) in the process of making a "Contained-In" determination (CID) for the remaining group of waste drums generated by similar field activities in the same OU. Section 5.0 of the IDW Strategy stipulates the requirement of an approved SAP for any waste to be disposed of in ERDF. Although the SAP for this OU waste has not yet been approved by Ecology, the Lead Agency, as part of the Work Plan under review, Ecology had deemed it adequate to satisfy the CID process that is more rigorous than the routine designation process. Also, this waste has been managed in

Addressees
00-ERD-182

-2-

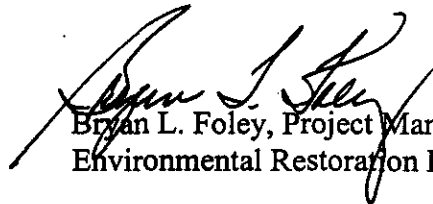
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accordance with the Waste Control Plan approved by Ecology, which specifies ERDF as the disposal location for this waste. Your granting of our exception to the requirement for an approved SAP and approval of this disposal as a special case will allow us to appropriately dispose of this waste at ERDF.

This request is submitted to both project managers responsible for the 200-CW-1 OU and the ERDF facility, for their approval of the disposal of this waste at ERDF.

If you have any questions regarding this request, please contact me at (509) 376-7087.

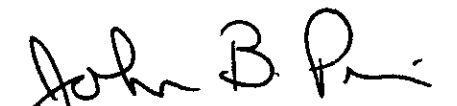
Sincerely,



Bryan L. Foley, Project Manager
Environmental Restoration Division

ERD:BLF

cc: J. Price, Ecology
D. R. Einan, EPA
Admin Record, H6-08 (200-CW-1)

The above request for the disposal at ERDF of the 8 drums containing waste from 200-CW-1 field investigation activities at the Gable Mountain Pond that were not covered by the contained in determination for Hydrazine is approved.


John Price, ER Project Manager
State of Washington, Department of Ecology,
NWP


David R. Einan, ERDF Manager
U.S. Environmental Protection Agency